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CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
DEPUTY

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff,
v.
THOMAS MAHONEY,
Defendant.

CASE NO. CR18-090 JCC
SUPERSEDING INFORMATION
(FELONY)

The United States Attorney charges that:

COUNT 1
(Travel with Intent to Engage in a Sexual Act with a Minor)

On or about November 29, 2016, in the Western District of Washington, and elsewhere, the defendant, THOMAS MAHONEY, did knowingly travel in interstate commerce, to wit from Seattle, Washington to the State of California, for the purpose of engaging in illicit sexual conduct, that is, a sexual act, as that term is defined by 18 U.S.C. § 2246, with a person under the age of eighteen, namely MV, which sexual act would constitute a violation of Title 18, United States Code, Chapter 109A.

All in violation of Title 18, United States Code, Sections 2423(b).

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SUPERSEDING INFORMATION – 1
THOMAS MAHONEY / CR18-090 JCC

UNITED STATES ATTORNEY
700 STEWART STREET, SUITE 5220
SEATTLE, WASHINGTON 98101
(206) 553-7970

COUNT 2

On or about May 15, 2017, in the Western District of Washington, and elsewhere, the defendant, THOMAS MAHONEY, did knowingly travel in interstate commerce, to wit from Seattle, Washington to the State of California, for the purpose of engaging in illicit sexual conduct, that is, a sexual act, as that term is defined by 18 U.S.C. § 2246, with a person under the age of eighteen, namely MV, which sexual act would constitute a violation of Title 18, United States Code, Chapter 109A.

All in violation of Title 18, United States Code, Sections 2423(b).

COUNT 3

On or about August 31, 2017, in the Western District of Washington, and elsewhere, the defendant, THOMAS MAHONEY, did knowingly travel in interstate commerce, to wit from Seattle, Washington to the State of California, for the purpose of engaging in illicit sexual conduct, that is, a sexual act, as that term is defined by 18 U.S.C. § 2246, with a person under the age of eighteen, namely MV, which sexual act would constitute a violation of Title 18, United States Code, Chapter 109A.

All in violation of Title 18, United States Code, Sections 2423(b).

COUNT 4
(Enticement of a Minor)

Between on or about July 1, 2016, and October 31, 2017, in Bellevue and Bothell, within the Western District of Washington, and elsewhere, THOMAS MAHONEY used a facility and means of interstate and foreign commerce, including the internet and a cellular phone, to knowingly persuade, induce, entice, and coerce MV, an individual who had not yet attained the age of 18 years, to engage in sexual activity for which a person can be criminally charged, to include Production of Child Pornography in violation of 18 U.S.C. § 2251(a).

All in violation of Title 18, United States Code, Section 2422(h) and 2427.

ASSET FORFEITURE ALLEGATION

Upon convictions of the offenses alleged in Counts 1 through 4 of this Superseding Information, THOMAS MAHONEY shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253, any property, real or personal, used or intended to be used to commit or promote the commission of such offense, or any property traceable to such property, and any and all visual depictions as described in Title 18, United States Code, Sections 2251, 2252, and 2252A, which were produced, transported, mailed, shipped, or received, in violation of Chapter 110, Title 18, United States Code, including but not limited to:

- a. Any and all images of child pornography, in whatever format and however stored;
- b. Lenova Laptop;
- c. Dell Inspiron Laptop;
- d. Samsung Galaxy S7 Cell Phone; and
- e. Samsung Galaxy S8 Cell Phone.

DATED this 11 day of September, 2018.

ANNETTE L. HAYES
United States Attorney

~~KATHERYN FRIERSON~~
Assistant United States Attorney

CECELIA Y. GREGSON
Special Assistant United States Attorney